

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

v.

CA. NO. 04-1350 (GMS)

DR. SYLVIA FOSTER, ET AL

2007 JAN 10 PM 4:49
FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
RGL signed

MOTION FOR DISCLOSURE,
FOR HAND WRITTEN INFORMATION
TO BE TRANSLATED INTO USABLE
FORM, PURSUANT TO RULE 37.

DATE: 1/8/07

Jimmie Lewis
SBI # 506622

DEL.CORR.CENTER
1181 PADDICK RD
SMYRNA, DE 19917

THE PLAINTIFF'S REQUEST VIA MOTION
FOR DISCLOSURE IS IN REGARDS TO
THE DOCUMENTS PRODUCED IN ACCORDANCE
TO THE PLAINTIFF'S FIRST MOTION
FOR DISCOVERY FILED 8/9/2006, DE. 75,
FOR WHICH THE DEFENDANT DR. SYLVIA FOSTER
RESPONDED ON 9/26/2006, DI. 81.

THE DILEMMA IS THAT THE FOLLOWING
DOCUMENTS ARE NOT IN USABLE FORM,
DUE TO SAID HAND WRITTEN INFORMATION
NOT BEING LEGIBLE. FOR THE AFOREMENTIONED
REASONS, THE PLAINTIFF HEREBY REQUEST THAT
THE DEFENDANT DR. SYLVIA FOSTER PROVIDE
TYPED MEMO'S OF THE FOLLOWING HAND WRITTEN
INFORMATION.

- 1.) PROVIDE A TYPED MEMO OF THE HANDWRITTEN INFORMATION NOTED ON THE D.P.C SECUSION/ RESTRAINT PATIENT FEED BACK FORM(S), PROVIDED VIA DISCOVERY, BECAUSE SAID HAND WRITTEN INFORMATION IS NOT LEGIBLE.
- 2.) PROVIDE A TYPED MEMO OF THE HAND WRITTEN INFORMATION NOTED ON THE D.P.C SECUSION OR RESTRAINT FORMS, PROVIDED VIA DISCOVERY, BECAUSE SAID HAND WRITTEN INFORMATION IS NOT LEGIBLE.
- 3.) PROVIDE A TYPED MEMO OF THE HAND WRITTEN INFORMATION NOTED ON THE D.P.C DOCTOR ORDER SHEETS DATING FROM 5/21/04 TO 6/25/04, PROVIDED VIA DISCOVERY, BECAUSE SAID WRITTEN INFORMATION IS NOT LEGIBLE.
- 4.) PROVIDE A TYPED MEMO OF THE HAND WRITTEN INFORMATION NOTED ON THE D.P.C INCIDENT REPORTS PROVIDED VIA DISCOVERY, BECAUSE SAID HAND WRITTEN INFORMATION IS NOT LEGIBLE.

5.) PROVIDE A TYPED MEMO OF THE HAND WRITTEN INFORMATION NOTED ON THE FCM CONSULTATION REQUEST DATED JUNE 9, 2004 PROVIDED VIA DISCOVERY, BECAUSE SAID WRITTEN INFORMATION IS NOT LEGIBLE.

6.) PROVIDE A TYPED MEMO OF THE HAND WRITTEN INFORMATION NOTED ON THE D.P.C SOCIAL ASSESSMENT, 6 PAGES. DATED 5/24/04 PROVIDED VIA DISCOVERY, BECAUSE SAID HAND WRITTEN INFORMATION IS NOT LEGIBLE.

7.) PROVIDE A TYPED MEMO OF THE HAND WRITTEN INFORMATION NOTED ON THE D.P.C CONSULTATION REQUEST AND REPORT, DATED JUNE 9, 2004, PROVIDED VIA DISCOVERY, BECAUSE SAID HAND WRITTEN INFORMATION IS NOT LEGIBLE.

8.) PROVIDE A TYPED MEMO OF THE HAND WRITTEN INFORMATION NOTED ON THE D.P.C DEPARTMENT OF HEALTH AND SOCIAL SERVICES, INSTITUTIONAL ADMISSION RECORD DATED 5/21/04, PROVIDED VIA DISCOVERY, BECAUSE SAID HAND WRITTEN INFORMATION IS NOT LEGIBLE.

9.) PROVIDE A TYPED MEMO OF THE
HAND WRITTEN INFORMATION NOTED ON
THE D.P.C INTERDISCIPLINARY GROUP
THERAPY DOCUMENTATION SITE, PROVIDED
VIA DISCOVERY, BECAUSE SAID HAND WRITTEN
INFORMATION IS NOT LEGIBLE.

10.) PROVIDE A TYPED MEMO OF THE HAND
WRITTEN INFORMATION NOTED ON THE D.P.C
PROGRESS NOTES, DATING FROM
5/21/04 TO 6/25/04 PROVIDED VIA DISCOVERY,
BECAUSE SAID HAND WRITTEN INFORMATION
IS NOT LEGIBLE.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DUE HEREBY CERTIFY ON THIS 8TH, DAY OF
JAN, 2007 THAT I DID MAIL ONE TRUE
AND CORRECT COPY OF THE MOTION FOR DISCLOSURE
FOR HAND WRITTEN INFORMATION TO BE
TRANSLATED INTO USABLE FORM, PURSUANT
TO RULE 37, BY U.S POSTAL TO THE FOLLOWINGS:

CLERK OF THE COURT (GMS)

UNITED STATES DISTRICT COURT
844 N. KING ST., LOCK BOX 18
WILMINGTON, DELAWARE 19801

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DATE : 1/8/07

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